

Chillicothe, Ohio Combination

Frequency proposes to acquire the licenses of or obtain an attributable interest in the following seven radio stations in the Chillicothe, Ohio area:

<i>Station</i>	<i>Community</i>	<i>Current Licensee</i>
WCHO-FM	Washington Court House, Ohio	Citicasters
WKKJ(FM)	Chillicothe, Ohio	CC Licenses
WSRW-FM ¹	Hillsboro, Ohio	CC Licenses
WBEX(AM)	Chillicothe, Ohio	Citicasters
WCHI(AM)	Chillicothe, Ohio	CC Licenses
WCHO(AM)	Washington Court House, Ohio	Citicasters
WSRW(AM)	Hillsboro, Ohio	CC Licenses

None of these radio stations are located within the geographic boundaries of an Arbitron radio market nor are any of the stations listed by Arbitron as “home” to any ranked market. The principal community contours of these seven stations do not overlap those of any other station not listed above in which Frequency holds or proposes to hold an attributable interest. Accordingly, the modified contour overlap methodology is appropriate for this combination.²

Modified Contour Overlap Methodology

As detailed in the attached Engineering Statement, the principal community contours of a number of the stations listed above overlap each other, creating three separate radio markets in which Frequency proposes to hold an attributable interest.

Market 1. Overlap of the principal community contours of WCHO(AM) and WCHO-FM creates one radio market for application of the Commission’s modified contour overlap methodology. This market includes at least eleven additional full-power stations in which Frequency does not propose to hold an attributable interest, for a total market of thirteen full-power radio stations. Consequently, Frequency’s proposed

¹ The instant application does not propose to assign the license of WSRW-FM, Hillsboro, Ohio, to Frequency. Frequency, however, will obtain an attributable interest in WSRW-FM by virtue of its operation of the station pursuant to a Local Marketing Agreement (“LMA”) post-closing. A construction permit application is pending proposing to change the community of license of WSRW-FM to Chillicothe, Ohio and to relocate the station. Upon grant and implementation of that permit, the LMA between CC Licenses and Frequency will terminate.

² See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *Report & Order & Notice of Proposed Rulemaking*, 18 FCC Rcd 13,620 (2003) (“*Biennial Review*”).

ownership of one FM station and one AM station in this market complies with the Commission's local radio ownership rules.

Market 2. Overlap of the principal community contours of WSRW(AM), WCHO-FM, and WSRW-FM (licensed facilities) creates a second radio market for application of the Commission's modified contour overlap methodology. This market includes at least thirteen additional full-power stations in which Frequency does not propose to hold an attributable interest, for a total market of sixteen full-power radio stations. Consequently, Frequency's proposed ownership of two FM stations and one AM station in this market complies with the Commission's local radio ownership rules.

Market 3. Overlap of the principal community contours of WCHI(AM), WBEX(AM), WSRW-FM (application), and WKKJ(FM) creates a third radio market for application of the Commission's modified contour overlap methodology. This market includes at least eighteen additional full-power stations in which Frequency does not propose to hold an attributable interest, for a total market of twenty-two full-power radio stations. Consequently, Frequency's proposed ownership of two FM stations and two AM stations in this market complies with the Commission's local radio ownership rules.

ATTACHMENT 1

Chillicothe Combination

Engineering Exhibit of duTreil, Lundin & Rackley, Inc.

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CHILLICOTHE, OHIO

This radio multiple ownership analysis was prepared to consider common ownership of the stations tabulated below under the FCC “Interim” contour analysis method. * GoodRadio.TV License, LLC. is acquiring several radio stations in the Chillicothe, Ohio area. Below is a tabulation of facilities for each station.

Call Sign / Facility ID	Location	Facilities
WCHO-FM/57354	Washington Court House, OH	CH 288A 6 kW 100 M
WKKJ(FM)/74224	Chillicothe, OH	CH 232B1 19 kW 343 M
WSRW-FM(Licensed)/65701	Hillsboro, OH	CH 294B 50 kW 75 M
WSRW-FM(APP)/65701	Chillicothe, OH	CH 293A 2.85 KW 127 M
WBEX(AM)/52041	Chillicothe, OH	1490 kHz 1 kW-U ND-1
WCHI(AM)(Licensed)/74225	Chillicothe, OH	1350 kHz 1 kW-D ND
WCHI(AM)(APP)/74225	Chillicothe, OH	1350 kHz 1 kW-D ND
WCHO(AM)/57355	Washington Court House, OH	1250 kHz 0.5 kW-D ND
WSRW(AM)/65700	Hillsboro, OH	1590 kHz 0.5 kW-D ND

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of some of the stations are involved in mutual overlap, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Radio Markets

The “radio markets” applicable to common ownership of the subject stations are defined as the areas encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WCHO	WCHO-FM
Market 2	WSRW	WCHO-FM/WSRW-FM (License)
Market 3	WCHI/WBEX	WSRW-FM (Application)/WKKJ-FM

Count of Stations in the Defined Market

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Markets	Minimum Number of Other Stations in the Radio Market
Market 1	6 AM, 5 FM; 11 Total
Market 2	5 AM, 8 FM; 13 Total
Market 3	4 AM, 14 FM; 18 Total

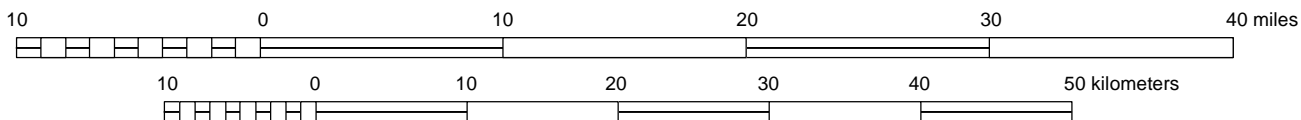
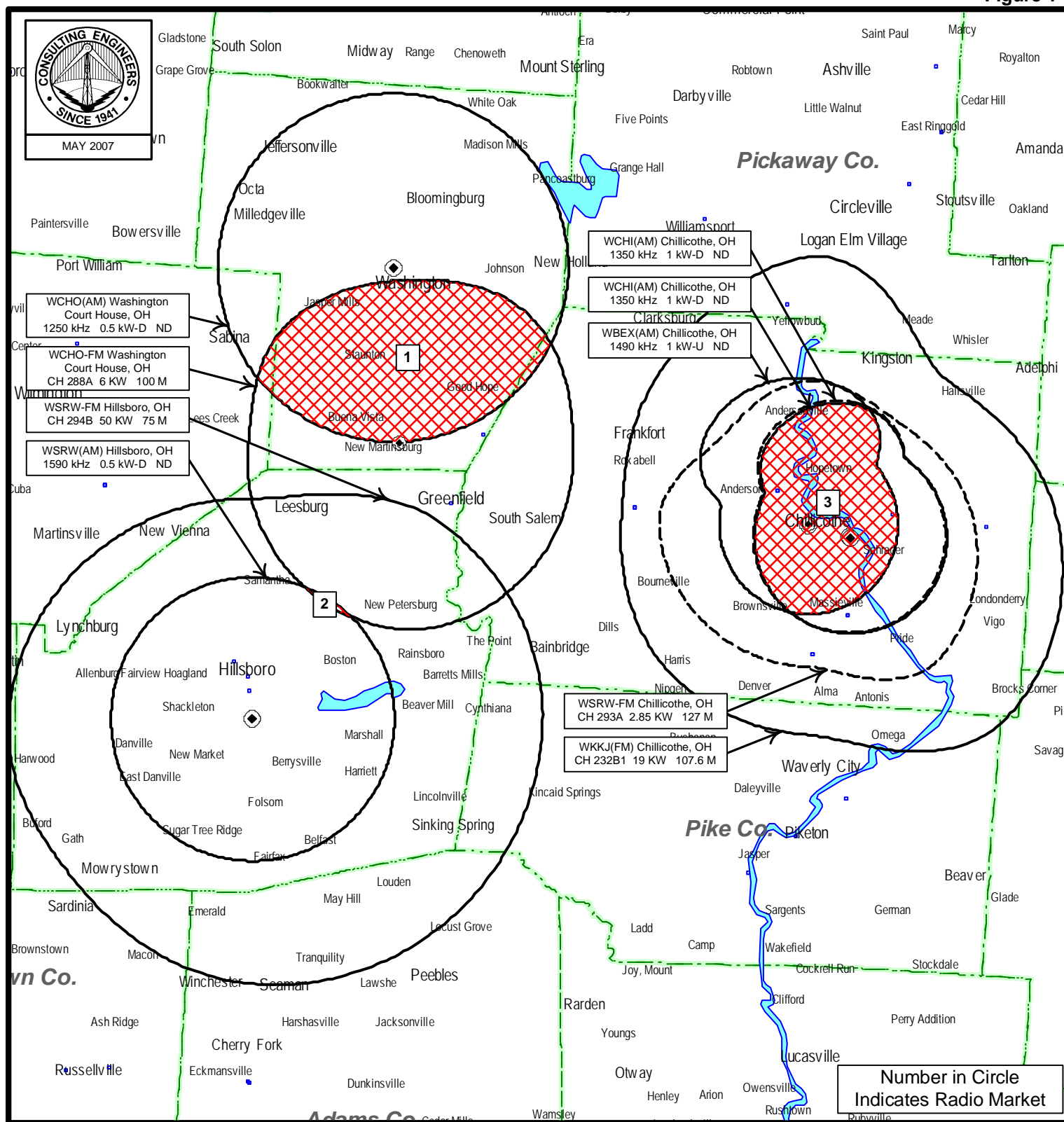
Figure 2 are tabulations of the radio stations identified in the defined radio market. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials evenly-spaced every 45 degrees of azimuth.

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

May 14, 2007

Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS CHILICOTHE, OHIO

GOODRADIO.TV LICENSE, LLC.

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

TECHNICAL STATEMENT
 RADIO MULTIPLE OWNERSHIP ANALYSIS
 GOODRADIO.TV LICENSE, LLC.

Tabulation of Other Stations Defined in the Radio Market #1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
WVXC	Chillicothe	OH	207
WOHC	Chillicothe	OH	211
WLZT	Chillicothe	OH	227
WVNU	Greenfield	OH	248
WNCI	Columbus	OH	250
WTVN	Columbus	OH	610
WLW	Cincinnati	OH	700
WOSU	Columbus	OH	820
WRFD	Columbus-Worthington	OH	880
WKFI	Wilmington	OH	1090
WYTS	Columbus	OH	1230

Tabulation of Other Stations Defined in the Radio Market #2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
WVXC	Chillicothe	OH	207
WVXW	West Union	OH	208
WOHC	Chillicothe	OH	211
WLZT	Chillicothe	OH	227
WVNU	Greenfield	OH	248
WKLN	Wilmington	OH	272
WRAC	West Union	OH	276
WPAY-FM	Portsmouth	OH	281
WKRC	Cincinnati	OH	550
WTVN	Columbus	OH	610
WLW	Cincinnati	OH	700
WRFD	Columbus-Worthington	OH	880
WKFI	Wilmington	OH	1090

Tabulation of Other Stations Defined in the Radio Market #3

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
WVXC	Chillicothe	OH	207
WOHC	Chillicothe	OH	211
WOUH-FM	Chillicothe	OH	220
WLZT	Chillicothe	OH	227
WHOK-FM	Lancaster	OH	238
WHOK-FM	Lancaster	OH	238
WKOV-FM	Wellston	OH	244
WVNU	Greenfield	OH	248
WCJO	Jackson	OH	249
WYRO	Mcarthur	OH	254

Figure 2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
WXZQ	Piketon	OH	261
WXIZ	Waverly	OH	265
WPAY-FM	Portsmouth	OH	281
WNKK	Circleville	OH	296
WTVN	Columbus	OH	610
WXIC	Waverly	OH	660
WRFD	Columbus-Worthington	OH	880
WYTS	Columbus	OH	1230